

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Defense Distributed,
Second Amendment Foundation, Inc.,
Firearms Policy Coalition, Inc.,
Firearms Policy Foundation,
Calguns Foundation,
California Association of Federal
Firearms Licensees, and
Brandon Combs,

Plaintiffs,

v.

Gurbir Grewal, Attorney General of the
State of New Jersey,
Defendant.

Civil Action No. _____

**PLAINTIFFS' PROPOSED ORDER
TO SHOW CAUSE WITH TEMPORARY RESTRAINING ORDER**

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**Pro hac vice* motions to be filed

Counsel for Plaintiffs

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ORDER TO SHOW CAUSE WITH TEMPORARY RESTRAINING ORDER

This matter having been presented to the Court upon the application of Plaintiffs, by and through their counsel, Hartman & Winnicki, P.C. and Beck Redden LLP (pro hac vice to be filed), by way of an application for an order seeking temporary restraints pursuant to Federal Rule Civil Procedure 65 and Local Civil Rule 65.1; and the Court having considered the verified complaint, the affidavits and other evidence, and the brief in support of the application; and good cause appearing, **IT IS** on this _ day of February 2019, **ORDERED** as follows:

1. Defendant Gurbir Grewal, in his capacity as Attorney General of New Jersey, shall appear before this Court on _____, 2019 at ___ a.m./p.m. or as

soon thereafter as counsel may be heard, at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street Trenton, NJ 08608, before the Honorable _____, U.S.D.J., to show cause why this Court should not enter an Order as follows:

- a. Enjoining New Jersey Attorney General Gurbir Grewal from enforcing New Jersey Statute 2C:39-9(l)(2) against Plaintiffs;
 - b. Enjoining New Jersey Attorney General Gurbir Grewal from directing the Plaintiffs to cease and desist publishing computer files with digital firearms information;
 - c. Enjoining New Jersey Attorney General Gurbir Grewal from directing Plaintiffs' communication service providers to cease and desist publishing Plaintiffs' computer files with digital firearms information; and
 - d. Applying against anyone that both receives actual notice of by personal service or otherwise and is either (1) an officer, agent, servant, employee, or attorney of New Jersey Attorney General Gurbir Grewal, or (2) in active concert or participation with New Jersey Attorney General Gurbir Grewal;
 - e. Not requiring security; and
 - f. Taking effect immediately and remaining in effect for the pendency of this litigation or until further action from this Court.
2. Pending the return date of this Order to Show Cause, a Temporary Restraining Order is hereby entered as follows:
- a. New Jersey Attorney General Gurbir Grewal is enjoined from enforcing New Jersey Statute 2C:39-9(l)(2) against Plaintiffs.

- b. New Jersey Attorney General Gurbir Grewal is enjoined from directing the Plaintiffs to cease and desist publishing computer files with digital firearms information.
 - c. New Jersey Attorney General Gurbir Grewal is enjoined from directing Plaintiffs' communication service providers to cease and desist publishing Plaintiffs' computer files with digital firearms information.
 - d. This order applies against anyone that both receives actual notice of it by personal service or otherwise and is either (1) an officer, agent, servant, employee, or attorney of New Jersey Attorney General Gurbir Grewal, or (2) in active concert or participation with New Jersey Attorney General Gurbir Grewal.
 - e. This Order shall remain in full force and effect until such time as the Court specifically orders otherwise.
3. Pursuant to Fed. R. Civ. P. 65(a)(2), it is hereby ordered that Plaintiffs' application for a preliminary injunction shall be advanced and consolidated with the trial of the Verified Complaint on the merits. This Order shall serve as notice of such consolidation.
4. A copy of this Order to Show Cause, along with all documents upon which the Order is based, shall be personally served upon Grewal on or before _____, 2019.

Dated: _____

United States District Judge